

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

Case No. MD-15-02641-PHX-DGC

This Document Relates to Plaintiff:
SONDRA KWIETNEWSKI
2:18-cv-01007-DGC

STIPULATION FOR DISMISSAL WITHOUT PREJUDICE

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff SONDRA KWIETNEWSKI and Defendants, C.R. BARD, INC. and BARD PERIPHERAL, through their undersigned counsel, that the above-captioned action is voluntarily dismissed, without prejudice, pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), each party to bear its own costs.

Dated: April 1, 2019.

Respectfully submitted,

/s/ Ben C. Martin

Ben C. Martin, Bar No. 13052400
Thomas Wm. Arbon, Bar No. 01284275
THE LAW OFFICE OF BEN C. MARTIN
3710 Rawlins Street, Suite 1230
Dallas, TX 75219
Telephone: (214) 761-6614
Facsimile: (214) 744-7590
bmartin@bencmartin.com
tarbon@bencmartin.com

Attorneys for Plaintiff Sondra Kwietnewski

AND

/s/ Sanjay Ghosh

Richard B. North, Jr, Bar No. 545599
Matthew Lerner, Bar No. 0548618

Sanjay Ghosh, Bar No. 141611
**NELSON MULLINS RILEY & SCARBOROUGH,
LLP**
201 17TH Street NW, Suite 1700
Atlanta, Georgia 30363
Telephone: (404) 322-6000
Facsimile: (404) 422-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com
sanjay.ghosh@nelsonmullins.com

Attorney for the Bard Defendants

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2019, a copy of the foregoing was served electronically and notice of the service of this document will be sent to all parties by operation of the Court's electronic filing system to CM/ECF participants registered to receive service in this matter. Parties may access this filing through the Court's system.

/s/ Ben C. Martin
Ben C. Martin